Appl. No. 10/597,960 Amdt. Dated June 22, 2009 Reply to Office action of April 24, 2009 Attorney Docket No. P19069-US1 EUS/GJ/P/09-6052

REMARKS/ARGUMENTS

1.) Claim Amendments

Applicant respectfully submits no new matter has been added. Accordingly, claims 1-16 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

2.) Claim Rejections - 35 U.S.C. § 103 (a)

Claims 1-16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Koskiahde (WO 03/047183) in view of Veerapalli, et al. (US 2003/0153325) and further in view of Oda, et al. (US 2004/0005886). Applicant respectfully traverses the Examiner's rejection and submits the following remarks for the Examiner's favorable reconsideration.

In response to the Examiner's rejection dated October 15, 2008, the Applicant previously submitted that the cited references at least failed to anticipate or render obvious a management part of the decision data memory providing "a second interface to a network control function entity allowing the network control function entity to access and modify the decision data memory independently from the mobile nodes." Applicant further submitted that, as an illustration, Fig. 8 of the present application showed a network control function entity (51) having access to the decision data memory (42) via a management part (43) independently from the mobile unit (47).

In response to Applicant's remarks, the Examiner now rejects independent Claims 1 and 9 using Oda et al (US. Pat. No. 2004/0005886 A1) as allegedly disclosing the above recited element. Applicant respectfully disagrees with the Examiner. It is true that the cellular network (100) and home location register (HLR, 12) of Oda shows a first interface to a radio terminal (11) via a base station (BS 122) interface and a second interface via a gateway (GW, 130). However, Oda fails to shows a second interface allowing the network control function entity to access and modify the decision data memory independently from the mobile nodes. As a matter of fact, the second interface between the gateway and the MSC/VLR is only used as a result of the mobile

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station performing a location registration update with the network. For example, the GW and CPS in Oda merely receives a location registration message from a mobile station using an IP access network. After creating an entry associating the IMSI and MSISDN number of the mobile station with an IP address, it then forwards the registration message to the gateway (Oda, Para 86-89). The gateway then transfers the location registration message to the MSC/VLR 121. (Oda, Para 91). Accordingly, the CPA in Oda act as a proxy server for correlating the MSISDN with a relevant IP address to enable the mobile station to utilize a cellular network by way of an IP network. Therefore, this proxy server is directly correlated with the mobile station and performs its proxy server functions as a direct result of receiving a location registration message from the mobile station.

However, nothing in Oda shows a second interface to a management part of the decision data memory which <u>allows a network control function entity to access and modify the decision data memory independently from the mobile station</u>. As indicated above, the CPA in Oda is instead invoked as a result of a mobile station performing its location registration process and <u>does not function independently of the mobile station</u> to access and modify the data stored in the HLR.

As a result, since Oda clearly fails to show a second interface between the decision data memory and a network control function entity which <u>enables the network control function entity to access and modify the decision data memory independently from the mobile station</u>, Applicant respectfully submits that independent claims 1 and 9 are patentable over the cited references. The Examiner's favorable reconsideration and a Notice of Allowance is earnestly requested.

Claims 2-8 and 10-16 depend from now allowable claims 1 and 9, respectively and recite further limitations in combination thereof. Therefore, the allowance of claims 1-16 is respectfully requested.

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CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

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